

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
MAR 17 1998
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
) CC Docket No. 95-116
Telephone Number Portability) NSD File No. L-98-23
) NSD File No. L-98-28

REPLY COMMENTS TO PETITIONS FOR WAIVER

MCI Telecommunications Corporation ("MCI"), by its attorneys, respectfully submits these reply comments in response to comments filed in the above-mentioned docket. Comments were sought regarding petitions filed by Sprint Local Telephone Companies ("Sprint") and AT&T Corporation ("AT&T") requesting that the Commission waive its March 31, 1998 deadline for implementation of long-term local number portability ("LNP") in MSAs scheduled for "Phase I" of LNP deployment in the Western, Southeast and West Coast regions.

INTRODUCTION AND SUMMARY

MCI urges the Commission to scrutinize closely all requests for delay in the implementation schedule for LNP deployment. The Commission should set May 11, 1998 as the outside date for completion of the Number Portability Administration Center ("NPAC") by the vendor and limit carriers to no more than four weeks of inter-company testing before requiring LNP to be up and running. The Commission should further require carriers to work diligently to beat those deadlines wherever possible, as they truly represent generous estimates of the length of time required by carriers to successfully implement LNP.

DISCUSSION

MCI agrees with WorldCom, Inc. ("WorldCom") that, although a consensus may exist among petitioners that the NPAC for the Western, Southeastern and West Coast regions will not be available until May 11, it is entirely possible that a stable platform will be ready before then. WorldCom Comments at 2. In that instance, carriers should not be given the freedom to wait until May 11 to start inter-company testing, but rather the Commission's ruling should clearly

No. of Copies rec'd 0+14
List ABCDE

require carriers to be ready to begin inter-company testing as soon as is technically feasible, to include any testing that can begin *before* completion of the NPAC.

Similarly, while most commentors have concluded that they will require 28-30 days after the NPAC completion date to complete inter-company testing,¹ it is technically feasible for the testing to be completed in less time. Under the Commission's existing rules, carriers should be internally ready to begin testing as soon as March 31. Certainly, neither Sprint nor AT&T cited under-development of their internal capabilities as a reason for further delays. Therefore, all testing that can be concluded prior to vendor completion of the NPAC should occur at at that time, and carriers should be ready to initiate any remaining inter-company testing the moment the NPAC is ready. Under these circumstances, it is entirely possible that carriers can be ready for LNP implementation prior to June 8-11 timeframe discussed by petitioners.

Finally, the comments differed with regard to the length of time required *after* completion of inter-company testing for carriers to initiate LNP. While Sprint and AT&T's requests for additional time after testing (five and fourteen days, respectively) are optimistic compared to petitions filed by other carriers, *see e.g.*, Bell South Comments at 5; SBC Comments at 2-3, they do not reflect reality. As noted above, allowing carriers until June 8, 1998 for NPAC completion and inter-company testing is more than enough of a delay to meet the needs of petitioners Sprint and AT&T. Rather than arbitrarily provide carriers an extra week or more of delays after testing is complete, the Commission should direct carriers to do everything in their power to implement LNP before June 8, but certainly no later than that date. The lack of any technologically valid argument in support of further delays, and the strong public interest in immediate implementation of LNP, leave the Commission with no other choice but to grant Sprint and AT&T waivers for the least possible extension in the LNP implementation schedule, or no later than June 8, 1998.

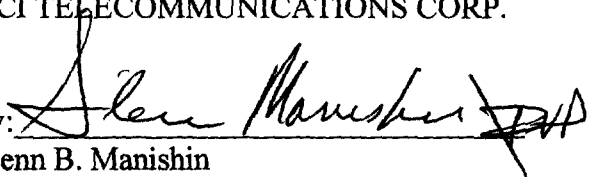
¹ MCI agrees with Sprint's timeline of four weeks, Sprint Petition at 1, while other commentors agreed that 30 days are necessary. AT&T Comments at ii; SBC Comments at 2; Bell South Comments at 3.

CONCLUSION

For these reasons, the Commission should grant the Petitions for Waiver of the LNP implementation deadline filed by Sprint and AT&T, but only to the extent absolutely necessary to prepare the NPAC for the Western, Southeast and West Coast regions.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORP.

By: 
Glenn B. Manishin
Blumenfeld & Cohen - Technology Law Group
Suite 700
1615 M. Street, N.W.
Washington, D.C. 20002
202.955.6300


Donna M. Roberts, Senior Counsel
MCI Telecommunications Corp.
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
202.887.2017

Counsel for MCI Telecommunications Corp.

Dated: March 17, 1998.

CERTIFICATE OF SERVICE

I, Amy E. Wallace, do hereby certify that on this 17th day of March, 1998, that I have served a copy of the foregoing document via *messenger and U.S. Mail, postage prepaid, to the following:


Amy E. Wallace

*Magalie Roman Salas
Secretary
FCC
1919 M Street, N.W.
Room 222
Washington, DC 20554

*Richard Metzger
Chief, Common Carrier Bureau
FCC
1919 M Street, N.W.
Room 500
Washington, DC 20554

*John Muleta
FCC
1919 M Street, N.W.
Room 500
Washington, DC 20554

*ITS
1231 20th Street, N.W.
Washington, DC 20037

*Marian Gordon
Network Services Div.
Common Carrier Bureau
FCC
2000 M Street, N.W.
Room 235
Washington, DC 20554

*Geraldine Matisse
Network Services Div.
Common Carrier Bureau
FCC
2000 M Street, N.W.
Room 246
Washington, DC 20554

*Andre Rausch
Network Services Div.
Common Carrier Bureau
FCC
2000 M Street, N.W.
Room 246
Washington, DC 20554

*Patrick Forster
Network Services Div.
Common Carrier Bureau
FCC
2000 M Street, N.W.
Room 246
Washington, DC 20554

*Joel Adler
Bellcore
2101 L Street, N.W.
Suite 600
Washington, DC 20036

James H. Bolin, Jr.
Mark C. Rosenblum
Roy E. Hoffinger
AT&T Corporation
295 North Maple Avenue
Basking Ridge, NJ 07920

Alan Hasselwander
Chairman
NANC
4140 Clover Street
Honeoye Falls, NY 14472

Jay C. Keithley
Sprint Corporation
1850 M Street, N.W.
11th Floor
Washington, DC 20036-5807

Sandra K. Williams
P.O. Box 11315
Kansas City, MO 64112